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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Chem Tech, Inc.
501 Bloomingdale Road.
Bristol, Indiana 46507

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-15761-00427	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 17, 2002 Expiration Date: July 17, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary adhesive manufacturing plant.

Authorized individual:	Dennis J. Brosh, President
Source Address:	501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address:	501 Bloomingdale Road, Bristol, Indiana 46507
SIC Code:	3322
Source Location Status:	Elkhart County
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) blending tanks used to blend flammable products, identified as Tanks A and C, constructed after August 1992, each with a maximum throughput rate of 2,800 pounds of product per batch, and have maximum capacities of 300 and 500 gallons, respectively.
- (b) Three (3) blending tanks used to blend nonflammable products, identified as Tanks B, E, and F, constructed after August 1992, each with a maximum throughput rate of 2,800 pounds of product per batch, and have maximum capacities of 175, 300, and 300 gallons, respectively.
- (c) One (1) aerosol can filling operation, with a maximum process rate of 1,120 cans per batch and 21 batches per day.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Five (5) natural gas-fired heaters, each with a heat capacity of 0.0073 MMBtu/hr.
- (b) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

- (1) One (1) propane tank, identified as Tank D, which is used as an aerosol propellant and operated in excess of twenty-nine and four-tenths (29.24) pounds per square inch absolute pressure, constructed after August 1992 with a maximum capacity of 18,000 gallons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
Telephone No.: 1-800-753-5519
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ and Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP)

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Two (2) blending tanks used to blend flammable products, identified as Tanks A and C, constructed after August 1992, each with a maximum throughput rate of 2,800 pounds of product per batch, and have maximum capacities of 300 and 500 gallons, respectively.
- (b) Three (3) blending tanks used to blend nonflammable products, identified as Tanks B, E, and F, constructed after August 1992, each with a maximum throughput rate of 2,800 pounds of product per batch, and have maximum capacities of 175, 300, and 300 gallons, respectively.
- (c) One (1) aerosol can filling operation, with a maximum process rate of 1,120 cans per batch and 21 batches per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4][326 IAC 8-1-6]

Pursuant to 326 IAC 2-8 (FESOP), 326 IAC 8-1-6 (BACT), and based on a two percent (2%) by weight VOC emission rate, the VOC input to each blending tank (Tank A, B, C, E, and F) plus the amount of any VOC used for clean-up activities for each tank shall not exceed 79 tons per month.

This throughput limit is equivalent to 19 tons of VOC emissions per year for each tank and a total of 95 tons per year of VOC emissions for all the bending tanks. Therefore, 326 IAC 8-1-6 (BACT) is not applicable. Combined with the VOC emissions from the can filling operation, the propane storage tank, and the insignificant combustion sources, this condition limits the VOC emissions from the entire source to less than 100 tons per year. Therefore, 326 IAC 2-7 is not applicable.

[Note: The Permittee has requested the monthly emission limits, instead of the limits of tons per twelve (12) consecutive month period.]

D.1.2 Hazardous Air Pollutants [326 IAC 2-8-4]

Pursuant to FESOP 039-6982-00427, issued on December 29, 1997, and 326 IAC 2-8-4 (FESOP), the HAPs input to the all the blending tanks (Tank A, B, C, E, and F) shall be limited as follows:

- (a) The amount of any single HAP delivered to the blending tanks plus the amount of any single HAP used for clean-up activities shall be limited to 39 tons per month. This limit is equivalent to emissions of 9.4 tons per year of a single HAP, based on a two percent by weight (2%) HAP loss rate.
- (b) The amount of any combination of HAPs delivered to blending tanks plus the amount of any combination of HAPs used for clean-up activities shall not exceed 100 tons per month. This limit is equivalent to emissions of 24 tons per year of total HAPs, based on a two percent by weight (2%) HAPs loss rate.

Combined with the HAP emissions from the can filling operation, the propane storage tank, and the insignificant combustion sources, the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of any HAPs. Therefore, 326 IAC 2-7 is not applicable.

Compliance Determination Requirements

D.1.3 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total VOC input for each blending tank and total HAP input for all the blending tanks (Tank A, B, C, E, and F) for the most recent twelve (12) month period.

D.1.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with VOC and HAPs usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined using formulation data supplied by the material manufacturer for the raw materials used in the blending tanks.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount, the VOC content, and the HAP content of each material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month; and
 - (4) The VOC and HAP contents in the final products.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (b) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:
 - (1) One (1) propane tank, identified as Tank D, which is used as an aerosol propellant and operated in excess of twenty-nine and four-tenths (29.24) pounds per square inch absolute pressure, constructed after August 1992 with a maximum capacity of 18,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 12-1][40 CFR 60.116b, Subpart Kb]

Pursuant to 40 CFR 60.116b, Subpart Kb (New Source Performance Standards for Volatile Organic Liquid Storage Vessels), the propane tank is subject to the record keeping requirements in 40 CFR 60.116b, paragraphs (a) and (b).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, the Permittee shall maintain records for the life of this propane tank in accordance with (1) through (2) below:
 - (1) The dimension of the storage vessel; and
 - (2) An analysis showing the capacity of the storage vessel.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: 501 Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: 039-15761-00427

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☒ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: 501 Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: 039-15761-00427

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: 501 Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: 039-15761-00427
Facility: Blending Tanks A, B, C, E, and F
Parameter: VOC Input
Limit: Less than 79 tons per month for each tank.

YEAR: _____

Month	VOC Input				
	Tank A	Tank B	Tank C	Tank E	Tank F

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: 501 Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: 039-15761-00427
Facility: All Blending Tanks (Tanks A, B, C, E, and F)
Parameter: HAPs input
Limit: Less than 39 tons per month for a single HAP and less than 100 tons per month for any combination of HAPs.

YEAR: _____

Month	Single HAP	Total HAPs
Limit	Less than 39 tons/month	Less than 100 tons/month

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Chem Tech, Inc.
Source Address: 501 Bloomingdale Road, Bristol, Indiana 46507
Mailing Address: 501 Bloomingdale Road, Bristol, Indiana 46507
FESOP No.: 039-15761-00427

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Chem Tech, Inc.
Source Location: 501 Bloomingdale Road, Bristol, Indiana 46507
County: Elkhart County
SIC Code: 3322
Operation Permit No.: F039-15761-00427
Permit Reviewer: ERG/YC

On June 14, 2002 the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Chem Tech, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate an adhesive manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with strikeout has been deleted.)

1. For clarification purposes, Condition C.14 has been revised to specify the actual due date for the Emission Statement.

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received **by April 15 of each year** ~~in accordance with the compliance schedule specified in 326 IAC 2-6-3~~ and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Chem Tech, Inc.
Source Location: 501 Bloomingdale Road, Bristol, Indiana 46507
County: Elkhart County
SIC Code: 3322
Operation Permit No.: F039-15761-00427
Permit Reviewer: ERG/YC

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Chem Tech, Inc. relating to the operation of an adhesive manufacturing plant. Chem Tech, Inc. was issued FESOP 039-6982-00427 on December 29, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) blending tanks used to blend flammable products, identified as Tanks A and C, constructed after August 1992, each with a maximum throughput rate of 2,800 pounds of product per batch, and have maximum capacities of 300 and 500 gallons, respectively.
- (b) Three (3) blending tanks used to blend nonflammable products, identified as Tanks B, E, and F, constructed after August 1992, each with a maximum throughput rate of 2,800 pounds of product per batch, and have maximum capacities of 175, 300, and 300 gallons, respectively.
- (c) One (1) aerosol can filling operation, with a maximum process rate of 1,120 cans per batch and 21 batches per day.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving advanced source modification at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

- (1) Five (5) natural gas-fired heaters, each with a heat capacity of 0.0073 MMBtu/hr.
- (b) Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emission less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:
 - (1) One (1) propane tank, identified as Tank D, which is used as an aerosol propellant and operated in excess of twenty-nine and four-tenths (29.24) pounds per square inch absolute pressure, constructed after August 1992 with a maximum capacity of 18,000 gallons.

Existing Approvals

- (a) FESOP 039-6982-00427, issued on December 29, 1997; and
- (b) First Administrative Amendment 039-10204-00427, issued on October 16, 1998

All conditions from previous approvals were incorporated into this FESOP, except the following:

- (a) FESOP 039-6982-00427, issued on December 29, 1997:

Conditions D.1.1 and D.2.6 limited the VOC input to each tank to less than 82.5 tons per month, which is equal to 990 tons per year of VOC input. Based on the VOC emission factor of 2% by weight, 990 tons per year of VOC input is equivalent to 19.8 tons per year of VOC emissions for each tank and is equivalent to 99 tons per year of VOC emissions from all five (5) blending tanks. Since the potential VOC emissions from the can filling process is 3.4 tons per year, the total potential to emit of VOC from the entire source is above 100 tons per year.

Changes to original conditions:

To limit the VOC emissions from the entire source to less than 100 tons per year, the VOC input limit for each tank has been changed to 950 tons per year in this FESOP, which is equivalent to the VOC emissions of 19 tons per year from each tank and 95 tons per year from all five tanks. Combined with the VOC emissions from the aerosol can filling process, propane storage tank, and the insignificant combustion units, the VOC emissions from the entire source are limited to less than 100 tons per year.

- (b) FESOP 039-6982-00427, issued on December 29, 1997:

No requirements were included in the original FESOP for the propane storage tank (Tank D), which has a maximum capacity of 18,000 gallons.

Changes to original conditions:

The propane storage tank (Tank D) has a maximum storage capacity greater than 40 cubic meters (10,560 gallons) and was constructed after July 23, 1984. Therefore, this tank is subject to the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (40 CFR 60.110b - 117b, Subpart Kb). Since the storage capacity of this tank is less than 75 cubic meters (19, 817 gallons), the source is only required to maintain records of the dimensions and capacity of the tank as specified in 40 CFR

60.116b(a) and 60.116b(b). The storage tank is also exempt from 40 CFR 60, Subpart A, requirements.

(c) FESOP 039-6982-00427, issued on December 29, 1997:

Tank A was used to blend nonflammable products and Tank B was used to blend flammable products.

Changes to original conditions:

The Permittee has proposed to switch the ingredients in Tanks A and B. Since both tank have the same maximum throughput rate and the same VOC input limit (less than 19 tons per year), this change will not affect any conditions in the FESOP. Therefore, Tank A is described as a blending tank for flammable products and Tank B is described as a tank for nonflammable products in this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 25, 2002. Additional information was received on May 30, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.01
PM-10	0.01
SO ₂	Negligible
VOC	218.11
CO	0.13
NO _x	0.16

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

*HAP's	Unrestricted Potential Emissions (tons/yr)
Benzeze	0.03
Toluene	30.88

*HAP's	Unrestricted Potential Emissions (tons/yr)
Xylene	1.11
Ethyl Benzene	0.36
Cumene	0.18
Naphthalene	0.12
Hexane	31.06
Methylene Chloride	183.78
Trichloroethylene	182.85
TOTAL	214.48

* A worst-case situation is considered for the HAP calculations while mixing different types of materials.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit any combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 29, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F039-6982-00427; issued on December 29, 1997).

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Blending Tanks A and C	-	-	-	Less than 38.0	-	-	Less than 9.4 for a single HAP and 24 for any combination of HAPs
Blending Tanks B, E and F	-	-	-	Less than 57.0	-	-	
Can Filling Operation	-	-	-	3.4	-	-	Negligible
Tank D (insignificant)	-	-	-	Less than 1.0	-	-	-

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Insignificant Combustion Units	0.01	0.01	Negligible	0.16	0.13	0.16	Negligible
Total Emissions	0.01	0.01	Negligible	Less than 99	0.13	0.16	Less than 10 for a single HAP and 25 for any combination of HAPs

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) All the blending tanks (Tanks A, B, C, E, and F) have maximum capacities less than 40 cubic meters (10,560 gallons) and are used for blending the product rather than storage of chemicals. Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to the blending tanks.
- (b) The propane storage tank (Tank D) has a maximum capacity greater than 40 cubic meters (10,560 gallons) and was constructed after July 23, 1984. Therefore, this tank is subject to the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (40 CFR 60.110b - 117b, Subpart Kb). Since the capacity is less than 75 cubic meters (19,800 gallons), this tank is only subject to the record keeping requirements in 40 CFR 60.116(b), paragraphs (a) and (b). The Permittee shall maintain records of the dimension of the propane storage tank and an analysis showing its capacity. These records shall be maintained in a readily accessible manner for the life of the storage vessel.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-8 (FESOP)

In order to simplify the reporting process, the Permittee has requested the monthly emission limits for each air pollutants. Therefore, the FESOP limits for this source are as follows:

- (a) Based on a two percent by weight (2%) VOC loss rate, the VOC input to each blending tanks (Tanks A, B, C, E, and F) plus the amount of any VOC used for clean-up activities shall not exceed 79 tons per month. This is equivalent to a total of 95 tons per year of VOC emissions for all the bending tanks ($79 \text{ tons/month/tank} \times 12 \text{ months/yr} \times 2\% \times 5 \text{ tanks} = 95 \text{ tons/yr}$). Combined with the VOC emissions from the can filling operation, the propane storage tank, and the insignificant combustion sources, the VOC emissions from the entire source is limited to less than 100 tons per year.
- (b) Pursuant to FESOP 039-6982-00427, issued on December 29, 1997, and based on a two percent by weight (2%) HAP loss rate, 326 IAC 2-8-4 (FESOP), the amount of any single HAP delivered to all the blending tanks plus the amount of any single HAP used for clean-up shall be limited to 39 tons per month, and the total HAP delivered to all the blending tanks plus the amount of HAPs used for clean-up activities shall be limited to 100 tons per month. This is equivalent to 9.4 tons per year of single HAP emissions ($39 \text{ tons/month} \times 12 \text{ months/yr} \times 2\% = 9.4 \text{ tons/yr}$), and 24 tons per year of total HAPs emissions ($100 \text{ tons/month} \times 12 \text{ months/yr} \times 2\% = 24 \text{ tons/yr}$). Combined with the HAP emissions from the can filling operation, the propane storage tank, and the insignificant combustion sources, the HAPs emissions from the entire source are limited to less than 10 tons per year for single HAP emissions and less than 25 tons per year for total HAPs emissions.

Compliance with these limitations makes 326 IAC 2-7 not applicable.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source is not 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and has the potential to emit of any regulated pollutant less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The source was constructed prior to July 27, 1997; therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is located in Elkhart County. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received by April 15 of each year. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Blending Tanks A, B, C, E, and F

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Based on a two percent (2%) VOC loss rate, the VOC input to each blending tanks (Tanks A, B, C, E, and F) plus the amount of any VOC used for clean-up for each tank shall not exceed 79 tons per month. This limit is equivalent to 19 tons of VOC emissions per year for each tank. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 6-3-2 (PM emissions from Process Operations)

The adhesive products are manufactured by mixing the liquid forms of materials. Therefore, no particulate matter is emitted from this process. Therefore, the requirements of 326 IAC 6-3-2 are not applicable.

State Rule Applicability - Aerosol Can Filling Operation

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential emissions of VOC from the aerosol can filling operation is less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) is not applicable.

State Rule Applicability - Insignificant activities

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is located in Elkhart County. Therefore, the propane storage tank is not subject to 326 IAC 8-9.

Testing Requirements

No testing requirements were included in the previous FESOP or in this FESOP because the compliance methods for the major pollutants (VOC and HAPs from the blending tanks) are based on mass balance and record keeping. The Permittee is confident in the assumption of 2% of VOC loss during the mixing process, and the VOC emission factor (2% by weight) will be verified by the VOC input and VOC content in the final products.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

No compliance monitoring requirements are necessary for their emissions units.

Conclusion

The operation of this adhesive manufacturing plant shall be subject to the conditions of the attached FESOP No.: F039-15761-00427.

Appendix A: Emissions Calculations
VOC and HAP Emissions
From the Two (2) Tanks for Flammable Products (Tanks A and C)

Company Name: Chem Tech Inc.
Address City IN Zip: 501 Bloomingdale Rd, Bristol, IN 46507
FESOP: F039-15761-00427
Reviewer: ERG/YC
Date: May 31, 2002

1. Total Emissions from tanks A and C:

Mixing Material	Maximum Usage (batch/yr)	Maximum Batch Size (lbs/batch)	VOC % by Weight	*VOC Flash Off (%)	Potential VOC Emission (tons/yr)	Weight % Hexane	Potential Hexane (ton/yr)	Weight % Toluene	Potential Toluene Emission (ton/yr)	Potential Total HAPs Emissions (ton/yr)
Hexane	1095	2800	100.0%	2.0%	30.66	100%	30.66			30.66
Toluene	1095	2800	100.0%	2.0%	30.66			100%	30.66	30.66
Cyclohexane	1095	2800	100.0%	2.0%	30.66					0.00
**Worst Case					30.66		30.66		30.66	30.66

*Emission Factors are from AP42, Chapter 6.4-1- Table 6.4-1: Uncontrolled emission factors for paint and varnish manufacturing (May, 1983).

Chem Tech verified this emission factor using a "mass balance" calculations. The information submitted in 1995 indicates that 1.8% of the material used is lost. An emission factor of 2% was used in this emission calculations.

**Worst Case Emissions (tons/yr) = Max. Potential Emissions between these three mixing materials.

Total Uncontrolled Potential Emissions for these 2 tanks:	VOC	Hexane	Toluene	Total HAPs
	30.7	30.7	30.7	30.7

METHODOLOGY

Potential VOC (tons/yr) = Max. Usage (batch/yr) x Max. Batch Size (lbs/batch) x VOC Weight (%) x VOC Flash Off (%) x (1 ton/2000 lbs)

Potential HAP (tons/yr) = Max. Usage (batch/yr) x Max. Batch Size (lbs/batch) x HAPs Weight (%) x VOC Flash Off (%) x (1 ton/2000 lbs)

Appendix A: Emissions Calculations
VOC, PM, and HAP Emissions
From the Three (3) Tanks for Nonflammable Products (Tanks B, E, and F)

Company Name: Chem Tech Inc.
Address City IN Zip: 501 Bloomingdale Rd, Bristol, IN 46507
FESOP: F039-15761-00427
Reviewer: ERG/YC
Date: May 31, 2002

1. For each tank:

a. From Mineral Spirits:

Mixing Material	Maximum Usage (batch/yr)	Maximum Batch Size (lbs/batch)	*VOC Flash Off (%)	Weight % VOC	Potential VOC Emission (tons/yr)	Weight % Benzene	Potential Benzene (ton/yr)	Weight % Toluene	Potential Toluene Emission (ton/yr)	Weight % Xylene	Potential Xylene Emission (ton/yr)	Weight % Ethyl Benzene	Potential Ethyl Benzene Emission (ton/yr)	Weight % Cumene	Potential Cumene Emission (ton/yr)	Weight % Naphthalene	Potential Naphthalene Emission (ton/yr)	Weight % Hexane	Potential Hexane Emission (ton/yr)	Total HAPs (tons/yr)
Mineral Spirits	2190	2800	2.0%	100.0%	61.32	0.01%	0.01	0.10%	0.06	0.60%	0.37	0.20%	0.12	0.10%	0.06	0.06%	0.04	0.20%	0.12	0.78

*Emission Factors are from AP42, Chapter 6.4-1- Table 6.4-1: Uncontrolled emission factors for paint and varnish manufacturing (May, 1983).

Chem Tech verified this emission factor using a "mass balance" calculation procedure. The information submitted in 1995 indicates that 1.8% of the material used is lost. An emission factor of 2% was used in these emission calculations.

b. From other mixing materials:

Mixing Material	Maximum Usage (batch/yr)	Maximum Batch Size (lbs/batch)	*VOC Flash Off (%)	Weight % VOC	Potential VOC Emission (tons/yr)	Weight % Methylene Chloride	Potential Methylene Chloride Emission (tons/yr)	Weight % Trichloroethylene	Potential Trichloroethylene Emission (tons/yr)	Total HAPs (tons/yr)
Methylene Chloride	2190	2800	2.0%	99.9%	61.26	99.9%	61.26			61.26
Trichloroethylene	2190	2800	2.0%	99.4%	60.95			99.4%	60.95	60.95

METHODOLOGY

Potential VOC (tons/yr) = Max. Usage (batch/yr) x Max. Batch Size (lbs/batch) x VOC Weight (%) x VOC Flash Off (%) x (1 ton/2000 lbs)

Potential HAP (tons/yr) = Max. Usage (batch/yr) x Max. Batch Size (lbs/batch) x HAPs Weight (%) x VOC Flash Off (%) x (1 ton/2000 lbs)

2. Worst-case situation from each tank:

Worst case situation is considered to be the maximum potential emissions for each pollutants while mixing one of the three mixing materials

VOC	Benzene	Toluene	Xylene	Ethyl Benzene	Cumene	Naphthalene	Hexane	Methylene Chloride	Trichloroethylene	Total HAPs
61.32 (tons/yr)	0.01	0.06	0.37	0.12	0.06	0.04	0.12	61.26	60.95	61.26

3. Potential Uncontrolled Emissions from Tanks B, E, and F:

VOC	Benzene	Toluene	Xylene	Ethyl Benzene	Cumene	Naphthalene	Hexane	Methylene Chloride	Trichloroethylene	Total HAPs
183.96 (tons/yr)	0.03	0.18	1.11	0.36	0.18	0.12	0.36	183.78	182.85	183.78

**Appendix A: Emission Calculations
VOC Emissions
From Aerosol Can Filling Operation**

Company Name: Chem Tech Inc.
Address City IN Zip: 501 Bloomingdale Rd, Bristol, IN 46507
FESOP: F039-15761-00427
Reviewer: ERG/YC
Date: April 5, 2002

1. Unit Description:

Maximum Throughput Rate: 21 batches/day
Maximum Capacity: 1120 can/batch
*Emission Factor: 0.0008 lbs VOC/can

* There is no applicable emissions factors for aerosol can filling process in AP-42. This emission factor is from the testing result for CCL Custom Manufacturing Barr/Niles Company in Niles, Illinois.

2. Uncontrolled Potential Emissions:

Potential VOC Emissions = 1120 can/batch x 21 batch/day x 365 day/yr x 0.0008 lbs/can x 1 ton/2000 lbs = **3.4 tons/yr**

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Insignificant Combustion Units (5 heaters combined)

Company Name: Chem Tech Inc.
Address City IN Zip: 501 Bloomingdale Rd, Bristol, IN 46507
FESOP: F039-15761-00427
Reviewer: ERG/YC
Date: April 5, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.365

3.2

	Pollutant					
	PM*	PM10*	SO2	**NO _x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	0.01	0.01	9.6E-04	0.16	0.01	0.13

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton